

**Hearing Date And Time: TBD**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

FIRESTAR DIAMOND, INC., *et al.*

Debtors.

RICHARD LEVIN, Chapter 11 Trustee of FIRESTAR  
DIAMOND, INC., FANTASY, INC., and OLD AJ, INC. f/k/a  
A. JAFFE, INC.,

Plaintiff,

v.

AMI JAVERI (A/K/A AMI MODI); PURVI MEHTA (A/K/A  
PURVI MODI); NEHAL MODI; NEESHAL MODI;  
CENTRAL PARK REAL ESTATE, LLC; CENTRAL PARK  
SOUTH 50 PROPERTIES, LLC; TRIDENT TRUST  
COMPANY (SOUTH DAKOTA) INC., solely as Trustee of the  
ITHACA TRUST; TWIN FIELDS INVESTMENTS LTD.;  
AURAGEM COMPANY LTD.; BRILLIANT DIAMONDS  
LTD.; ETERNAL DIAMONDS CORPORATION LTD.;  
FANCY CREATIONS COMPANY LTD.; HAMILTON  
PRECIOUS TRADERS LTD.; SINO TRADERS LTD.;  
SUNSHINE GEMS LTD.; UNIQUE DIAMOND AND  
JEWELLERY FZE; WORLD DIAMOND DISTRIBUTION  
FZE; VISTA JEWELRY FZE; EMPIRE GEMS FZE;  
UNIVERSAL FINE JEWELRY FZE; DIAGEMS FZE; TRI  
COLOR GEMS FZE; PACIFIC DIAMONDS FZE;  
HIMALAYAN TRADERS FZE; UNITY TRADING FZE;  
FINE CLASSIC FZE; DG BROTHERS FZE,

Defendants.

Chapter 11

No. 18-10509 (SHL)

(Jointly Administered)

Adv. Proc. No. 20-1054

**Oral Argument Requested**

**NOTICE OF MOTION TO DISMISS THE COMPLAINT**

**PLEASE TAKE NOTICE** that Defendant Purvi Mehta a/k/a Purvi Modi hereby moves  
this Court before the Honorable Sean J. Lane, in Courtroom 701 of the United States Bankruptcy  
Court, Southern District of New York, One Bowling Green, New York, New York, 10004, for an

Order dismissing the Complaint of Richard Levin, Chapter 11 Trustee of Firestar Diamond, Inc., Fantasy, Inc. and Old AJ., Inc. f/k/a A. Jaffe, Inc., with prejudice pursuant to Federal Rule of Bankruptcy Procedure 7012(b) and Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), 12(b)(5) and 12(b)(6), and for such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that in support of the motion, Ms. Mehta shall rely upon the accompanying Memorandum of Law, dated September 15, 2020, and Declaration of Purvi Modi a/k/a Purvi Mehta, dated September 11, 2020.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Dated: September 15, 2020  
New York, New York

DUANE MORRIS LLP

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